

**REMARKS**

The present amendment is submitted in response to the Office Action dated June 4, 2003, which set a three-month period for response, making this amendment due by September 4, 2003.

Claims 12-22 are pending in this application.

In the Office Action, claims 10 and 11 were objected to as being indefinite "product by process claims". Claims 1-11 were rejected under 35 U.S.C. 102(a) as being anticipated by U.S. Patent No. 6,201,326 to Klappenbach et al.

In this amendment, the Applicants wish to note that in the Simultaneous Amendment, claims 1-11 were canceled and replaced with a new set of claims, incorrectly numbered 1-11 also. Thus, in this amendment, the new claims submitted with the Simultaneous Amendment have been correctly renumbered as claims 12-22, with claim dependencies changed accordingly.

Also in this amendment, the claims have been amended to conform to U.S. claim format standards. Claims 21 and 22 (former claims 10 and 11) have been rewritten in method claim format to recite a series of method steps.

With regard to the substantive rejection of the claims, the Applicants respectfully disagree that the cited reference anticipates the present invention as defined in claims 12-22.

One distinction between the present invention and Klappenbach is that Klappenbach fails to provide any disclosure of the limitation that the brush holder is "loosely coupled" to the printed circuit board. The elements in Fig. 5

mentioned by the Examiner in the Office Action were not intended to loosely couple the brush holder to the printed circuit board (PCB) for installation of the actuator. Rather, the elements in Klappenbach noted by the Examiner are for "fixedly" connecting the brush holder and the PCB.

In addition, Klappenbach's description teaches the following:

"affixing" the brush holder 25 to the printed circuit board 30 (column 3, lines 33-34); and

"securing" the printed circuit board 30 (column 3, lines 45-56).

"Affixing" a part so that it can secure another part does not imply "loosely coupling" part with one another.

In addition, Klappenbach discloses that the brush holder "is equipped as a component on a printed circuit board" (see abstract). This teaches one skilled in the art to properly attach (or affix or secure) a part to a PCB, so that it cannot move, not to loosely couple this part to the PCB.

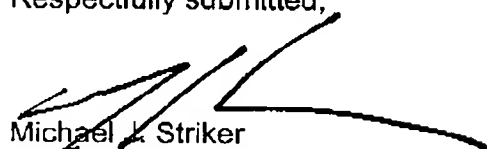
The reference to Moskob, cited as relevant to the present invention, does not teach a brush holder for installation in the actuator, which is loosely coupled to a printed circuit board. According to column 4, lines 3-7, Moskob teaches a firm connection between these parts through a bridge 30. Therefore, main claim 12 also is patentably over the Moskob reference.

For the reasons set forth above, the Applicants respectfully submit that claims 12-22 are patentable over the cited reference. The Applicants further request withdrawal of the rejection under 35 U.S.C. 102 and reconsideration of the claims as herein amended.

In light of the foregoing arguments in support of patentability, the Applicants respectfully submit that this application stands in condition for allowance. Action to this end is courteously solicited.

Should the Examiner have any further comments or suggestions, the undersigned would very much welcome a telephone call in order to discuss appropriate claim language that will place the application into condition for allowance.

Respectfully submitted,



Michael J. Striker  
Attorney for Applicant  
Reg. No.: 27233  
103 East Neck Road  
Huntington, New York 11743  
631-549-4700

FAX RECEIVED  
AUG 11 2003  
TECHNOLOGY CENTER 2800